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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: John P. Kerr a/k/a John Kerr

Debtor(s)

CHAPTER 13

Deutsche Bank National Trust Company, as Indenture Trustee, for New Century Home Equity Loan Trust 2006-1

Movant

NO. 23-10496 MDC

VS.

John P. Kerr a/k/a John Kerr

Respondent(s)

11 U.S.C. Section 362

KENNETH E. WEST ESQUIRE

**Trustee** 

## **CERTIFICATE OF NO OBJECTION**

I, Mark A. Cronin, attorney for Movant, do hereby certify that to the best of my knowledge, information, and belief, no answer or objection is pending by the Debtor, or the Trustee to the Motion for Relief from Automatic Stay filed on May 18, 2023, in Doc No. 23-10496-MDC. The Debtor did file an answer but withdrew it on July 11, 2023. Accordingly, it is respectfully requested that this Honorable Court enter the order appended to the Motion for Relief from the Automatic Stay.

/s/ Mark A. Cronin Mark A. Cronin, Esq. KML Law Group, P.C. BNY Mellon Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106 Phone: (215)-627-1322

mcronin@kmllawgroup.com

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v.

John P. Kerr a/k/a John Kerr

Debtor(s)

KENNETH E. WEST ESQUIRE

**Trustee** 

**CERTIFICATE OF SERVICE** 

I, the undersigned, certify that I served or caused to be served, on <u>July 12, 2023</u>, a copy of the above Certificate of No Objection filed herewith upon each of the following persons and parties in interest at the addresses shown below:

KENNETH E. WEST ESQUIRE Office of the Standing Chapter 13 Trustee 1234 Market Street, Suite 1813 Philadelphia, PA 19107 (VIA ECF)

Anthony A. Frigo Esq. One West Main Street, Suite 230 (VIA ECF) Norristown. PA 19401

Date: July 12, 2023

/s/ Mark A. Cronin Mark A. Cronin, Esq. KML Law Group, P.C. BNY Mellon Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106 Phone: (215)-627-1322

mcronin@kmllawgroup.com